

I would like to comment on the SAVI comments regard amateur operator's comments. I found them to be more smoke and mirrors than substance. There are a number of problems with their comments.

First they are claiming major DOD support of this request, but DOD official support is noticeably lacking. I would indeed suspect that the DOD does intend to use part of their system. That part is the container number part. This part works already with the system as is and as approved under the existing regulations. As was covered in my previous filing I doubt very much that the DOD is going to place lists on contents of destinations on their containers where anyone with a radio could read and worse modify the data in the system. Again their problem is not a lack of resources to do the job but bad engineering added to excellent sales efforts. The commission should not reward bad engineering.

Also they have commented that they have done a test to show that there was not interference between their system and an Amateur station. You will note that they used an absolute best case system. Can we always count on the container being closed, and high gain antenna's being pointed directly out into space. You will note that they did not do this test with the antenna's directivity including the container. You will note that they did not do this test with other modes of weak signal that use slightly less gain antenna's such as satellite work.

You will also note that they did not even address this issue of amateur interference with their system. Let's see a study that shows an EME array pointed directly at the container from even a mile away transmitting with max power. This can and will happen. It will not be unusual for this situation to exist at a terminal for even days on end. Will their proposed system work at the ranges they are proposing? I doubt it.

So please don't pay attention to the smoke or be tricked by the mirrors and tell these people to actually engineer properly what their sales force has sold.